

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Joseph Berti

CHAPTER 13

DEBTOR
Nationstar Mortgage LLC
MOVANT

BANKRUPTCY CASE NUMBER
16-11046/MDC

VS.

11 U.S.C. SEC. 362

Joseph Berti
RESPONDENT/DEBTOR

William C. Miller, TRUSTEE
ADDITIONAL RESPONDENT(S)

NATIONSTAR MORTGAGE LLC'S
NOTICE OF DEFAULT OF STIPULATION

RE: PROPERTY KNOWN AS 3249 Princeton Avenue, Philadelphia, PA 19149

TO:

Joseph Berti
3249 Princeton Avenue
Philadelphia, PA 19149

Brad J. Sadek, Esquire
1315 Walnut Street
Suite 502
Philadelphia, PA 19107
Sent via electronic notification: brad@sadeklaw.com

You are hereby notified that the Debtor is in default of the terms of the Stipulation entered into by the parties and approved by the Court. The Debtor has failed to make the following payments and late charges:

Regular payments of \$942.75 from February 1, 2020 through April 1, 2020 which total \$2,828.25;

Attorney fee of \$100.00 for this Notice of Default

Less Debtor's Suspense \$(117.73)

TOTAL DEFAULT AS OF APRIL 3, 2020 IS \$2,810.52

If the default continues to the following month, the Debtor shall include funds to cure that month's default as well. Pursuant to the terms of the Stipulation, the full cure of the default must be via certified funds, money orders or cashier's check, with the loan number clearly written

thereon and made payable to Nationstar Mortgage LLC d/b/a Mr. Cooper. During pendency of this default, please remit all payments to:

Shapiro & DeNardo, LLC
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406

The default must be cured within 15 days from the date below or Movant shall file a Certification of Default with the Court, and request the Court to enter an Order granting Movant relief from the Automatic Stay.

Respectfully submitted,

Dated: April 6, 2020

BY: /s/ Michael J. Clark
Michael J. Clark, Esquire
Shapiro & DeNardo, LLC
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610) 278-6800/ fax (847) 954-4809
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S&D File #:15-049385